

**LAW OFFICES OF DALE K. GALIPO**

Dale K. Galipo, Esq. (Bar No. 144074)

[dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)

21800 Burbank Boulevard, Suite 310

Woodland Hills, California 91367

Tel: (818) 347-3333

Fax: (818) 347-4118

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

AMALIA DEEL and MICHAEL  
DEEL, individually and as successors-  
in-interest to TYLER DEEL, deceased;

Plaintiffs,

vs.

COUNTY OF FRESNO; and DOES 1-  
10, inclusive,

Defendants.

**Case No. 1:24-cv-00885-KES-EPG**

**STIPULATION FOR LEAVE FOR  
PLAINTIFFS TO FILE FIRST  
AMENDED COMPLAINT**

*[Redlined [Proposed] First Amended  
Complaint, Clean First Amended  
Complaint, and Proposed order filed  
concurrently herewith]*

**TO THE HONORABLE COURT:**

Plaintiffs AMALIA DEEL and MICHAEL DEEL (hereinafter “Plaintiffs”) and Defendant County of Fresno (hereinafter “Defendant”), by and through their attorneys of record, hereby stipulate as follows:

1. Plaintiffs may file a First Amended Complaint. The parties expressly stipulate that good cause exists for permitting the filing of the First Amended Complaint to name the involved Fresno County Sheriff’s Deputy as a defendant in this case because no party will be prejudiced and because it will facilitate the efficient progress of this litigation.

2. A redlined copy of Plaintiffs' Proposed First Amended Complaint for Damages is attached hereto as "Exhibit A."

3. A "clean" copy of Plaintiffs' Proposed First Amended Complaint for Damages is attached hereto as "Exhibit B."

4. The First Amended Complaint will serve as the operative complaint in this above-referenced litigation.

5. Plaintiffs shall file the First Amended Complaint no more than seven (7) days after the date of the Court's order approving this stipulation.

6. Defendant shall accept service of the First Amended Complaint via the electronic case filing system.

7. Defendants file a responsive pleading to Plaintiffs' First Amended Complaint shall be served and filed no more than twenty-one (21) days after the date of service.

8. Defendants reserve the right to file whatever responsive pleading they deem appropriate and by executing this stipulation do not waive any defense or argument they may assert in response to Plaintiffs' First Amended Complaint.

**IT IS SO STIPULATED.**

DATED: January 22, 2025

LAW OFFICES OF DALE K. GALIPO

By /s/ Dale K. Galipo  
Dale K. Galipo  
Attorney for Plaintiff

DATED: January 22, 2025

PORTER SCOTT

By /s/ Alison Southard  
William Camy, Esq.  
Alison Southard, Esq.  
Attorneys for Defendant  
COUNTY OF FRESNO